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Insurance Company
Federal Bar No.: DF-2294

DARE INVESTMENTS, LLC, a Utah limited
liability company,

Plaintiff,

vs.

CHICAGO TITLE INSURANCE COMPANY, a
Missouri domiciled insurer; HORIZON TITLE
AGENCY, Inc., a New Jersey domiciled company;
CHICAGO TITLE RICO ENTERPRISE, a
racketeering enterprise,

Defendants.

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

Case Action No.2:10-CV-06088(DRD)(MAS)

**DERRICK R. FREIJOMIL'S
CERTIFICATION IN SUPPORT OF
CHICAGO TITLE INSURANCE
COMPANY'S MOTION FOR
REVOCATION OF PRO HAC VICE
ADMISSIONS AND DISQUALIFICATION
OF COUNSEL**

**MOTION RETURN DATE:
JANUARY 17, 2012**

I, DERRICK R. FREIJOMIL, hereby certify as follows:

1. I am an attorney-at-law admitted to practice in the United States District Court for the District of New Jersey and am a counsel of the law firm of Riker, Danzig, Scherer, Hyland & Perretti LLP, attorneys for Chicago Title Insurance Company ("Chicago Title") in the above-referenced matter. As such, I am fully familiar with the facts stated herein based upon personal knowledge and review of documents. I make this certification in support of Chicago Title's Motion for Revocation of Pro Hac Vice Admissions and Disqualification of Counsel.

2. On November 15, 2011, the undersigned counsel and counsel for Dare Investments, LLC ("Dare"), Peter Strojnik ("Strojnik Sr."), participated in a conference

call before the Hon. Michael A. Shipp, U.S.M.J., regarding an application submitted on behalf of Chicago Title to adjourn two depositions Strojnik Sr. had scheduled for that week. After hearing argument from both counsel, Judge Shipp granted Chicago Title's request to have the depositions adjourned and directed the parties to complete all productions and resolve all discovery issues before proceeding with depositions.

3. Strojnik Sr. then asked Judge Shipp if he could email his production that evening and continue the depositions as scheduled. Judge Shipp denied the request and indicated that permitting such a production just 36 hours before the depositions were to begin would require Chicago Title to try to review all the produced documents overnight and try to prepare for the depositions, which was prejudicial and unfair to Chicago Title as Strojnik Sr. had agreed to produce them on November 11, 2011.

4. During the same November 15, 2011 conference call before Judge Shipp, the request for a thirty-day extension was raised, and Judge Shipp specifically asked Strojnik Sr. if there was anything further he wished to add as to the application. Strojnik Sr. provided no further information on the application and did not disclose anything with regard to the disciplinary proceedings or sanctions against him. The Court denied the requested extension.

I hereby certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

DATED: December 21, 2011



DERRICK R. FREIJOMIL